

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Camille Williams and
Carrie Athanasselis,

Case File No.:

Plaintiffs,

**NOTICE OF REMOVAL
OF ACTION TO
UNITED STATES DISTRICT COURT**

v.

City of Minneapolis and John Does 1-10,

Defendants.

Defendant City of Minneapolis, through its attorney, Kristin R. Sarff, Assistant City Attorney, Minneapolis City Attorney's Office, 350 South Fifth Street, Room 210, Minneapolis, MN 55415, hereby gives notice to the Plaintiffs Camille Williams and Carrie Athanasselis, through their attorneys of record, and to the Court as follows:

1. The City of Minneapolis is a Defendant in an unfiled civil action captioned to be in the District Court of the Fourth Judicial District of the State of Minnesota entitled *Camille Williams and Carrie Athanasselis v. City of Minneapolis and John Does 1-10*. The Complaint has been served on the City of Minneapolis, but has not yet been filed in the State Court. No other pleadings have been served. No trial date has been set.

2. On December 8, 2015, a copy of the Summons and Complaint in the above-entitled action was served on the City of Minneapolis. A copy of the Summons and Complaint are attached as **Exhibit 1**. A copy of the Notice of Filing Removal is attached as **Exhibit 2**. A copy of the City of Minneapolis' Civil Cover Sheet is attached as **Exhibit 3**.

4. This Notice of Removal of Action to Federal Court is filed pursuant to 28 U.S.C. § 1441(a). The Plaintiffs' lawsuit, captioned in the State Court, is a civil action alleging that the City of Minneapolis and its employees violated the Plaintiffs' rights under the U.S. Constitution and federal statutory law, resulting in injury to the Plaintiffs.

5. The Complaint alleges that the City of Minneapolis and its employees violated the First, Fourth, and Fourteenth Amendments to the U.S. Constitution, and 42 U.S.C. § 1983. These are claims over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1343(a)(3), as they arise under the laws of the United States within the meaning of 28 U.S.C. § 1331. This case is therefore removable under 28 U.S.C. § 1441.

6. The Complaint asserts pendant common law claims under Minnesota law. This Court has supplemental jurisdiction over Plaintiffs' state claims under 28 U.S.C. § 1367(a).

8. The City of Minneapolis files herewith a copy of all process, pleadings and orders served upon them in this action. The City of Minneapolis has sent written notice of the filing of this Notice of Removal of Action to Federal Court to Plaintiffs, through their counsel of record, and will promptly file a copy of this Notice with the Clerk of the District Court for the Fourth Judicial District of the State of Minnesota, County of Hennepin.

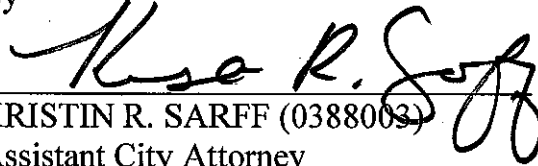
WHEREFORE, notice is hereby given that this action is removed from the State Court to this Court for trial or such other determination as this Court may make regarding the action and in accordance with its jurisdictional limits under 28 U.S.C. § 1441.

Dated: December 23, 2015

SUSAN L. SEGAL

City Attorney

By

A handwritten signature in black ink, appearing to read "Kristin R. Sarff", is written over a horizontal line.

KRISTIN R. SARFF (0388003)

Assistant City Attorney

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(612) 673-3919

Attorneys for Defendant City of Minneapolis